

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

KISS NAIL PRODUCTS, INC.,

Plaintiff,

v.

SHENZHEN JINRI ELECTRICAL
APPLIANCE CO. LTD. dba VAV and
VIVID & VOGUE; and JOHN DOE 1 dba
ROPALIA,

Defendants.

No. 2:18-cv-05625 (PKC) (GRB)

**KISS'S REPLY BRIEF IN SUPPORT OF ITS MOTION FOR DEFAULT
JUDGMENT AND ORDER GRANTING PERMANENT INJUNCTIVE RELIEF**

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*Counsel for Plaintiff Kiss Nail Products,
Inc.*

Plaintiff Kiss Nail Products, Inc. (“Kiss”) filed a motion for default judgment on September 23, 2019. Pursuant to Local Civil Rule 6.1(b), Defendant Shenzhen Jinri Electrical Appliance Co. Ltd.’s (“Jinri”) opposition to that motion was due on October 7, 2019. As Jinri did not file an opposition to Kiss’s motion, nor has Jinri otherwise defended this action, Kiss respectfully requests that the Court enter default judgment against Jinri and permanently enjoin Jinri’s infringing conduct as provided in the Proposed Order submitted with Kiss’s September 23 moving papers.

Respectfully submitted,

/s/ Eric A. Prager

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*Counsel for Plaintiff Kiss Nail Products,
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2019, I caused the foregoing document to be sent via international courier (FedEx international priority mail) to Defendant Shenzhen Jinri Electrical Appliance Co. Ltd. at the business address listed below:

Shenzhen Jinri Electrical Appliance Co. Ltd.
Jinri Electrical Park, Zone 1st
Paotai Rd.
Gongming, Shenzhen 518106
People's Republic of China

I further certify that on October 9, 2019, I emailed courtesy copies of the above papers to the following email addresses known to be used by Defendant Shenzhen Jinri Electrical Appliance Co. Ltd.:

sales3@jinriea.com

sales1@jinriea.com

/s/ Eric A. Prager
Eric A. Prager